

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARK ANDREWS p/k/a "Sisqo", JAMES
GREEN p/k/a "Woody", LARRY ANTHONY, JR.
p/k/a "Jazz"

Plaintiffs,

-v.-

27 RED MUSIC PUBLISHING, LLC, successor to
27 Red Music, LLC, THE ESTATE OF RHONDO
ROBINSON, SONY/ATV MUSIC PUBLISHING,
LLC, as successor to EMI Music Pub., John and
Jane Does 1-50, ABC Companies 1-10,

Defendants.

Civil Action No.: 1:15-cv-07544-AJN

ECF Case

**DECLARATION OF LORI ADLER
IN SUPPORT OF MOTION TO DISMISS
THE AMENDED COMPLAINT**

Lori Adler declares the following under 28 U.S.C. § 1746:

1. I am a Vice President, Business Affairs at Sony/ATV Music Publishing LLC. I submit this Declaration in support of the Motion to Dismiss the Amended Complaint submitted by EMI April Music Inc. and EMI Blackwood Music Inc. ("EMI"). I have personal knowledge of the facts stated herein and would and could testify competently thereto if called as a witness in this matter.

2. One of my responsibilities as the Vice President of Business Affairs is to oversee the administration of contracts executed by EMI.

3. Attached hereto at Exhibit 1 is a true and correct copy of the music publishing administration agreement between EMI, on the one hand, and music publisher Art of War Music Publishing, Inc., on the other hand, dated as of July 1, 2002.

4. Attached hereto as Exhibit 2 is a true and correct copy of a letter from Rhondo Robinson, on 27 Red Music LLC letterhead, to "EMI Music – Royalty Dep.", dated April 8,

2005, enclosing a letter of direction concerning Mark Andrews, dated April 5, 2005, as well as prior correspondence from Mr. Robinson, dated March 30, 2005. This document includes handwritten notations that were present on the document as located in our files.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 4, 2016
New York, New York


Lori Adler